

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| UNITED STATES OF AMERICA | : | DATE FILED: _____ |
| v. | : | CRIMINAL NO. _____ |
| CORNELL GOODMAN, aka "Honiff" | : | VIOLATIONS: |
| | : | 18 U.S.C. § 371 |
| | : | (conspiracy - 1 count) |
| | : | 18 U.S.C. § 1028A(a)(1), (c)(5) |
| | : | (aggravated identity theft - 3 counts) |
| | : | 18 U.S.C. § 1341- (mail fraud - 5 counts) |
| | : | 18 U.S.C. § 1344 - (bank fraud - 3 counts) |
| | : | 18 U.S.C. § 1956(a)(1)(B)(i) (money |
| | : | laundering - 4 counts) |
| | : | 18 U.S.C. § 513 (uttering a forged |
| | : | security- 6 counts) |
| | : | 18 U.S.C. § 2 (aiding and abetting) |
| | : | Notice of Forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The following were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation:

- a. Citizens Bank, certificate number 57282
- b. Sovereign Bank, certificate number 29950.
- c. Manufacturer's and Trading Trust Company ("M&T Trust"),
certificate number 34069;
- d. The Bank of Hanover, certificate number 12986;

e. The Bank of America (formerly Fleet Bank), certificate number 3510; and,

f. PNC Bank, certificate number 6384.

2. From at least in or about October 2003 through in or about August 2006, in the Eastern District of Pennsylvania, and elsewhere, defendant

CORNELL GOODMAN,

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to:

a. knowingly and without lawful authority transfer, possess and use a means of identification of another person, during and in relation to mail and bank frauds, in violation of Title 18, United States Code, Section 1028A;

b. devise and intend to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and in furtherance of that scheme placed in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, in violation of Title 18, United States Code, Section 1341;

c. knowingly execute, and attempt to execute, a scheme to defraud, and to obtain monies owned by and under the care, custody, and control of a financial institution by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18,

United States Code, Section 1344;

- d. knowingly conduct and willfully cause financial transactions affecting interstate commerce knowing that the transaction is designed in whole or part to conceal or disguise the nature, the source, the ownership, or the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956; and,
- e. make, utter or possess a forged security of an organization, with the intent to deceive another person, organization or government, in violation of Title 18, United States Code, Section 513.

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, stole checks, created fictional companies, and opened at least twelve separate bank accounts using fraudulent identification documents, for the purpose of facilitating schemes to fraudulently obtain money and property totaling in excess of \$2 million.

4. Defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, purchased or otherwise obtained stolen checks made payable to other entities.

5. Defendant CORNELL GOODMAN opened, or directed others to open, bank accounts in the names of the other entities using fraudulent documents, including purported certificates of incorporation and fake driver's licenses. Defendant GOODMAN, together with

others known and unknown to the grand jury, deposited the fraudulently obtained checks into these accounts.

6. Once these checks cleared, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, obtained money from the accounts, either through cash withdrawals or by issuing checks to themselves, using false names and means of identification.

7. Defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, also used stolen checks in conjunction with fake driver's licenses to purchase various merchandise.

8. Defendant CORNELL GOODMAN kept most of the stolen proceeds and provided some to others known and unknown to the grand jury.

OVERT ACTS

In furtherance of the conspiracy, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

Longwood Lane

1. From on or about October 23, 2003 through on or about October 25, 2003, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, cashed, and attempted to cash, checks in New Castle, Delaware that had been stolen from Longwood Lane Company in Paoli, Pennsylvania using fake Pennsylvania driver's licenses bearing the names of J.J. and J.L.

“D.S. Construction Company”

2. On or about March 23, 2004, at the direction of defendant CORNELL GOODMAN, W.C., charged elsewhere, opened two bank accounts at Manufacturers and Trading Trust Company (“M&T Trust”) in West York, Pennsylvania in the name of D.S, and one in the name of S Construction, using fraudulent documents, including a fake driver’s license bearing the name D.S.

3. On or about April 5, 2004, at the direction of defendant CORNELL GOODMAN, W.C. opened another S Construction account at Bank of Hanover in York, Pennsylvania using fraudulent documents, including a fake driver’s license bearing the name D.S.

4. On or about April 5, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, used a fake D.S. driver’s license to have D.S.’ mail re-routed to an address controlled by defendant GOODMAN in York, Pennsylvania.

5. On or about April 6, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, opened another S Construction account at Bank of Hanover using fraudulent documents, including a fake Pennsylvania driver’s license and an insurance identification card bearing the name of D.S.

6. On or about April 20, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, telephoned the Equitable Insurance Company claiming to be D.S. and successfully caused the company to changed D.S.’s policy mailing address to the same address controlled by defendant GOODMAN.

7. On or about April 27, 2004, defendant CORNELL GOODMAN, together

with others known and unknown to the grand jury, obtained and submitted a loan application for approximately \$250,000 in D.S.' name to the Equitable Insurance Company.

8. On or about April 29, 2004, Equitable Insurance mailed a check for approximately \$250,000 to D.S. at the address controlled by defendant CORNELL GOODMAN.

9. On or about May 11, 2004, at the direction of defendant CORNELL GOODMAN, W.C. deposited the approximately \$250,000 Equitable Insurance check into one of the D.S. M&T Trust accounts.

10. On or about May 17, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited a check for approximately \$100,000 drawn on the S Construction M&T Trust account into the S Construction Bank of Hanover account.

11. Throughout May 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, emptied the D.S. accounts by writing checks and making cash withdrawals.

Teva Pharmaceuticals

12. On or about May 11, 2004, Teva Pharmaceuticals issued a check made payable to a legitimate supplier, Andrx Corporation, for approximately \$601,194.24 that defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, stole.

13. On or about June 9, 2004, at the direction of defendant CORNELL GOODMAN, W.C. opened a bank account in the name of "Andrx Corporation" at Fleet National Bank in Cheltenham, Pennsylvania using a false Delaware certificate of incorporation, a

fake credit card, and a fake Pennsylvania driver's license.

14. On or about June 11, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited the stolen \$601,194.24 check from TEVA into the fraudulent Andrx account at Fleet Bank.

15. From on or about June 15, 2004 through on or about July 9, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, emptied the fraudulent Andrx account of approximately \$598,472.96 by writing checks and making withdrawals against the account.

Cardinal Health Service

16. On or about August 17, 2004, at the direction of defendant CORNELL GOODMAN, a person unknown to the grand jury opened an account at M&T Trust in Philadelphia in the name of Cardinal Health Service, Inc. ("Cardinal") using fraudulent documents, including a fake Delaware certificate of incorporation and a fake Pennsylvania driver's license.

17. On or about August 19, 2004, at the direction of defendant CORNELL GOODMAN, M.L., charged elsewhere, deposited a check for approximately \$292,839.54 into the Cardinal account.

18. On or about August 26, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, wrote checks and made cash withdrawals against the Cardinal account totaling approximately \$9,000, until it was frozen by M&T Trust on or about August 27, 2004.

Aramark

19. On or about August 25, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, opened a bank account at Citizens Bank in Philadelphia in the name of Media Financial Group, Inc. (“Media Financial”) using fraudulent documents, including a fake Pennsylvania driver’s license in the name of C.D. Media Financial did not perform any actual business and was created by defendant GOODMAN to further his fraudulent schemes.

20. On or about September 10, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, opened a bank account at Sovereign Bank in Villanova, Pennsylvania in the name of Media Financial using fraudulent documents, including a fake Pennsylvania driver’s license in the name of C.D.

21. On or about October 1, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, opened a bank account at Fleet Bank in Philadelphia in the name of Green Mountain Capital Investments (“Green Mountain”) using fraudulent documents, including a fake Pennsylvania driver’s license in the name of C.D. Green Mountain did not perform any actual business and was created by defendant GOODMAN to further his fraudulent schemes.

22. From in or about August 2004 through in or about November 2004, defendant CORNELL GOODMAN, in conjunction with, R.B., a former Aramark employee charged elsewhere, knowingly submitted false and fraudulent invoices and/or computer entries to Aramark, Inc. on behalf of Green Mountain and Media Financial. As a result of these invoices and/or entries, Aramark issued and mailed at least four checks totaling approximately \$1,072,731.38 payable to these “companies.”

23. On or about October 4, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited an Aramark check for approximately \$345,672 into Media Financial's Citizens Bank account.

24. On or about October 12, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited an Aramark check for approximately \$108,940.30 into Green Mountain's Fleet Bank account.

25. On or about October 18, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited an Aramark check for approximately \$390,566.08 into Green Mountain's Fleet Bank account.

26. On or about November 1, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited an Aramark check for approximately \$227,553 into Media Financial's Citizens Bank account.

27. From on or about October 7, 2004 through on or about December 10, 2004 defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, emptied the fraudulent Media Financial and Green Mountain accounts by writing checks and making cash withdrawals against the accounts.

"J. A.B., Inc."

28. On or about November 8, 2004, defendant CORNELL GOODMAN, together with another individual unknown to the grand jury, opened an account at Fleet Bank in Philadelphia in the name of J.A.B., Inc., using fraudulent documents.

29. On or about November 10, 2004, defendant CORNELL GOODMAN and W.C. opened another J.A.B. account at Sovereign Bank in Philadelphia using fraudulent

documents, including a fake New Jersey driver's license and a fake Delaware certificate of incorporation.

30. On or about November 10, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited a approximately \$64,975.88 check from Media Financial into the J.A.B. Fleet bank account.

31. On or about November 15, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jur, deposited a check for approximately \$298,435.77 from Media Financial into the J.A.B. Fleet bank account.

32. On or about November 15, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited a check for approximately \$49,446.90 from Media Financial into the J.A.B. Sovereign account.

33. On or about November 15, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited a check for approximately \$192,853.36 from Media Financial into the J.A.B. Fleet bank account.

34. From on or about November 8, 2004 through on or about December 9, 2004, defendant CORNELL GOODMAN and W.C., together with others known and unknown to the grand jury, deposited and withdrew over \$550,000 in fraudulently obtained funds through the J.A.B. accounts.

“V.R.”

35. On or about August 8, 2006, defendant CORNELL GOODMAN fraudulently identified himself as V.R. and purchased approximately \$1,127 worth of merchandise at Lowe's in Lawnside, New Jersey. Defendant GOODMAN paid for this

merchandise by signing a stolen check in V.R.'s name and using a fake Pennsylvania driver's license bearing V.R.'s name.

36. On or about August 9, 2006, defendant CORNELL GOODMAN fraudulently identified himself as V.R. and purchased approximately \$2,620 worth of merchandise at Lowe's in Maple Side, New Jersey. Defendant GOODMAN paid for this merchandise by signing a stolen check in V.R.'s name and using a fake Pennsylvania driver's license in V.R.'s name.

37. On or about August 9, 2006, defendant CORNELL GOODMAN fraudulently identified himself as V.R. and purchased approximately \$4,379.51 worth of hardwood flooring at Floors USA located at 450 South Lenola Road, Maple Shade, New Jersey ("Floors USA"). Defendant GOODMAN paid for this merchandise by signing a stolen check in V.R.'s name and using a fake Pennsylvania driver's license bearing V.R.'s name. Defendant GOODMAN then made arrangements with S.C., charged elsewhere, to pick up the stolen merchandise using a truck rented in Philadelphia.

38. On or about August 10, 2006, defendant CORNELL GOODMAN fraudulently identified himself as V.R. and purchased approximately \$2,519 worth of merchandise at Avalon Tile and Carpet in Vineland, New Jersey. Defendant GOODMAN paid for this merchandise by signing a stolen check in V.R.'s name and using a fake Pennsylvania driver's license bearing V.R.'s name.

39. On or about August 11, 2006, S.C. arrived at Floors USA in a U-Haul truck rented in Philadelphia and told an employee that he was there to "pick-up the wood for 'Mr. R.'" S.C. produced a copy of the sales ticket for defendant CORNELL GOODMAN's

transaction and took thirty-five cartons of wood out of the store.

40. On or about August 12, 2006, defendant CORNELL GOODMAN fraudulently identified himself as V.R. and purchased approximately \$4,486.51 worth of hardwood flooring at Floors USA using a stolen V.R. check and fake Pennsylvania driver's license. On or about August 16, 2006, S.C. attempted to pick-up this flooring.

41. On or about August 15, 2006, defendant CORNELL GOODMAN fraudulently identified himself as V.R. and purchased approximately \$6,600 worth of merchandise at Avalon Tile and Carpet in Cherry Hill, New Jersey. Defendant GOODMAN paid for this merchandise by signing a stolen check in V.R.'s name and using a fake Pennsylvania driver's license bearing V.R.'s name.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and overt Act 1 of Count One are incorporated here.
2. During October 2003, Longwood Lane Company LLC (“Longwood”) was a Paoli, Pennsylvania-based company that had an account with PNC Bank.
3. In or about October 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

CORNELL GOODMAN,

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud PNC Bank, and to obtain monies owned by and under the care, custody, and control of PNC Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

4. Defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, stole checks from Longwood.
5. Defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, fraudulently and without authorization wrote Longwood checks payable to fictitious payees, including J.J and J. L.
6. Defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, negotiated in excess of \$19,000 in these stolen checks at PNC Bank branches in New Castle, Delaware using false driver’s licenses bearing the names J.J. and J.L.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 and 3-8 and Over Acts 2-11 of Count One are incorporated here.
2. D.S. was an elderly man who resided in Warminster, Pennsylvania, with no connection to S Construction.
3. D.S. had a policy with the Equitable Insurance Company that enabled him to obtain loans.
4. From in or about March 2004 through in or about May 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, utilized a fake D.S. Pennsylvania driver's license to fraudulently obtain a loan for approximately \$250,000 in D.S.'s name.

THE SCHEME

5. From in or about April 2004 to in or about May 2004, defendant **CORNELL GOODMAN,** devised and intended to devise a scheme, and aided and abetted a scheme, to defraud the Equitable Insurance Company, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

6. On or about March 23, 2004, at the direction of defendant CORNELL GOODMAN, W.C. opened two bank accounts at Manufacturers and Trading Trust Company

("M&T Trust") in West York, Pennsylvania in the name of D.S and one in the name of S Construction using fraudulent documents, including a fake driver's license bearing the name D.S.

7. On or about April 5, 2004, at the direction of defendant CORNELL GOODMAN, W.C. opened another S Construction account at Bank of Hanover in York, Pennsylvania using fraudulent documents, including a fake driver's license bearing the name D.S.

8. On or about April 5, 2004, at the direction of defendant CORNELL GOODMAN, W.C. utilized a fake D.S. driver's license to have D.S.' mail re-routed to an address in York, Pennsylvania that was controlled by defendant GOODMAN.

9. On or about April 20, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, telephoned the Equitable Insurance Company claiming to be D.S. and successfully caused the company to change D.S.'s policy mailing address to the same York, Pennsylvania address controlled by defendant GOODMAN.

10. On or about April 27, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, obtained and submitted a loan application for approximately \$250,000 in D.S.' name to the Equitable Insurance Company.

12. On or about April 29, 2004, Equitable Insurance mailed a check for approximately \$250,000 to D.S. at the York, Pennsylvania address controlled by defendant CORNELL GOODMAN.

13. On or about May 11, 2004, defendant CORNELL GOODMAN and W.C., deposited the Equitable Insurance check into one of D.S.' M&T Trust accounts.

14. Throughout May 2004, defendant CORNELL GOODMAN and W.C.

emptied the D.S. accounts by writing checks and making cash withdrawals.

15. On or about April 29, 2004, in the Eastern and Middle Districts of Pennsylvania, and elsewhere, defendant

CORNELL GOODMAN,

for the purpose of executing, and aiding and abetting the execution of, the scheme described above, and attempting to do so, knowingly caused to be delivered by United States mail, according to the directions thereon, a check for approximately \$250,000 from the Equitable Insurance Company in Charlotte, North Carolina payable to D.S. in York, Pennsylvania.

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-3 and 5-13 of Count Three are incorporated here.
2. On or about March 23, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

CORNELL GOODMAN,

knowingly and without lawful authority transferred, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, D.S., during and in relation to a mail fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 12 through 15 of Count One are incorporated here.

2. From in or about May 2004 through in or about July 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

CORNELL GOODMAN,

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Fleet Bank, and to obtain monies owned by and under the care, custody, and control of Fleet Bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. On or about May 11, 2004, Teva Pharmaceuticals issued a check made payable to a legitimate supplier, Andrx Corporation, for approximately \$601,194.24 that defendant CORNELL GOODMAN and W.C., together with others known and unknown to the grand jury, stole.

4. On or about June 9, 2004, at the direction of defendant CORNELL GOODMAN, W.C. opened a bank account in the name of "Andrx Corporation" at Fleet National Bank in Cheltenham, Pennsylvania using a false Delaware certificate of incorporation, a fake credit card, and a fake Pennsylvania driver's license in the name of J.R.

5. On or about June 11, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury deposited the stolen \$601,194.24 check from Teva into the fraudulent Andrx account at Fleet Bank.

6. From on or about June 15, 2004 through on or about July 9, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, emptied the fraudulent Andrrx account of approximately \$598,472.96 by writing checks and making withdrawals against the account.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 16-18 of Count One are incorporated here.
2. From on or about August 17, 2004 through on or about August 27, 2004 in the Eastern District of Pennsylvania, defendant

CORNELL GOODMAN,

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud M&T Trust, and to obtain monies owned by and under the care, custody, and control of M&T Trust by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. On or about August 17, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, opened an account at M&T Trust in Philadelphia in the name of Cardinal Health Service, Inc. ("Cardinal") using fraudulent documents, including a fake Delaware certificate of incorporation and a fake Pennsylvania driver's license.
4. On or about August 19, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, deposited a stolen check made payable for Cardinal for approximately \$292,839.54 into fraudulent the Cardinal account.
5. On or about August 26, 2004, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, wrote checks and made withdrawals against the fraudulent Cardinal account totaling approximately \$9,000, until it was frozen by

M&T Trust on or about August 27, 2004.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS SEVEN THROUGH TEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 and 3-8 and Overt Acts 19-27 of Count One are incorporated here.
2. R.B., charged elsewhere, was employed as an accounting clerk at Aramark, a professional services company based in Philadelphia, Pennsylvania.
 2. In that capacity, R.B. was responsible for entering vendor invoices to be paid by Aramark.
 3. Aramark paid its invoices by checks that were mailed to vendors via the United States mail.

THE SCHEME

4. From in or about August 2004 to in or about December 2004, defendant

CORNELL GOODMAN,

devised and intended to devise a scheme to defraud Aramark, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

5. Defendant CORNELL GOODMAN, in conjunction with R.B. and others known and unknown to the grand jury, knowingly submitted false and fraudulent invoices and/or computer entries on behalf of Green Mountain Capital Investments and Media Financial Group (the "Companies").

6. These invoices and/or computer entries falsely and fraudulently stated that Aramark owed the Companies money for services that had been performed, when, in fact, those services had not been performed.

7. As a result of these invoices and/or entries, Aramark issued and mailed at least four checks totaling approximately \$1,072,731.38 to the Companies.

8. On or about the dates listed in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

CORNELL GOODMAN

for the purpose of executing, and aiding and abetting the execution of, the scheme described above, and attempting to do so, knowingly caused to be delivered by United States mail, according to the directions thereon within Philadelphia, Pennsylvania, the following Aramark checks:

| COUNT | CHECK DATE | CHECK NO. | APPROX. AMOUNT | PAYEE |
|-------|------------|------------|-------------------|-----------------|
| Seven | 9/30/04 | 0005405559 | \$345,672.00 | Media Financial |
| Eight | 10/5/04 | 0005426117 | \$108,940.30 | Green Mountain |
| Nine | 10/13/04 | 0005446532 | \$390,566.08 | Green Mountain |
| Ten | 10/27/04 | 0005486531 | \$227,553.00 | Media Financial |

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS ELEVEN THROUGH FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 19-35 of Count One are incorporated here.
2. On the dates set forth in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CORNELL GOODMAN,

knowingly conducted, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

| <u>Count</u> | <u>Date</u> | <u>Description</u> |
|---------------------|--------------------|--|
| 11 | 11/10/04 | Deposited a check for approximately \$64,975.88 from Media Financial into the J.A.B., Inc. Fleet bank account. |
| 12 | 11/15/04 | Deposited a check for approximately \$298,435.77 from Media Financial into the J.A.B., Inc. Fleet account. |
| 13 | 11/15/04 | Deposited a check for approximately \$49,446.90 from Media Financial into the J.A.B., Inc. Sovereign bank account. |
| 14 | 11/15/04 | Deposited a check for approximately \$192,853.36 from Media Financial into the J.A.B., Inc. Fleet account. |

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendant CORNELL GOODMAN, together with others known and unknown to the grand jury, knew that the property involved in these transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, mail fraud, in violation of Title 18, United

States Code, Section 1341, and defendant CORNELL GOODMAN acted with the knowledge that the transactions were designed, in whole or in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-4 of Counts Eleven through Fourteen are incorporated here.
2. On or about November 10, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

CORNELL GOODMAN,

knowingly and without lawful authority transferred, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, J.B., during and in relation to money laundering.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 35-41 of Count One are incorporated here.

2. On or about August 8, 2006, in the Eastern District of Pennsylvania, the District of New Jersey and elsewhere, defendant

CORNELL GOODMAN,

with intent to deceive another person and organization, that is, Lowe's, knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possessing of, a forged security of an organization operating in and affecting interstate commerce, that is, a forged PNC Bank check of a person known to the grand jury as "V.R.," in the amount of approximately \$1127.69.

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 35-41 of Count One are incorporated here.

2. On or about August 9, 2006, in the Eastern District of Pennsylvania, the District of New Jersey and elsewhere, defendant

CORNELL GOODMAN,

with intent to deceive another person and organization, that is, Floors USA, knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possessing of, a forged security of an organization operating in and affecting interstate commerce, that is, a forged PNC Bank check of a person known to the grand jury as "V.R.," in the amount of approximately \$4,379.51.

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 35-41 of Count One are incorporated here.

2. On or about August 9, 2006, in the Eastern District of Pennsylvania, the District of New Jersey and elsewhere, defendant

CORNELL GOODMAN,

with intent to deceive another person and organization, that is, Lowe's, knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possessing of, a forged security of an organization operating in and affecting interstate commerce, that is, a forged PNC Bank check of a person known to the grand jury as "V.R.," in the amount of approximately \$2,620.

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 35-40 of Count One are incorporated here.

2. On or about August 10, 2006, in the Eastern District of Pennsylvania, the District of New Jersey and elsewhere, defendant

CORNELL GOODMAN,

with intent to deceive another person and organization, that is, Avalon Tile & Carpet, Inc., knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possessing of, a forged security of an organization operating in and affecting interstate commerce, that is, a forged PNC Bank check of a person known to the grand jury as "V.R.," in the amount of approximately \$2,519.96.

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 35-41 of Count One are incorporated here.

2. On or about August 12, 2006, in the Eastern District of Pennsylvania, the District of New Jersey and elsewhere, defendant

CORNELL GOODMAN,

with intent to deceive another person and organization, that is, Floors USA, knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possessing of, a forged security of an organization operating in and affecting interstate commerce, that is, a forged PNC Bank check of a person known to the grand jury as "V.R.," in the amount of approximately \$4,486.51.

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3-8 and Overt Acts 35-41 of Count One are incorporated here.

2. On or about August 15, 2006, in the Eastern District of Pennsylvania, the District of New Jersey and elsewhere, defendant

CORNELL GOODMAN,

with intent to deceive another person and organization, that is, Avalon Tile & Carpet, Inc., knowingly made, uttered, and possessed, and aided and abetted the making, uttering, and possessing of, a forged security of an organization operating in and affecting interstate commerce, that is, PNC Bank, a forged check of a person known to the grand jury as "V.R.," in the amount of approximately \$6,660.48.

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Overt Acts 35-41 of Count One are incorporated here.
2. From on or about August 8, 2006 through on or about August 15, 2006, in the

Eastern District of Pennsylvania and elsewhere, defendant

CORNELL GOODMAN,

knowingly and without lawful authority transferred, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, V.R. during and in relation to the uttering of a forged security.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 1028A, 1341, 1344, and 1956, as set forth in this indictment, defendant

CORNELL GOODMAN,

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$2,257,559.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney